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Federal Communications Commission  
Office of the Secretary

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June 4, 1992

Office of the Secretary  
FCC  
1919 M. St. N.W.  
Washington, D.C. 20554

Dear Secretary:

Please find endlosed 10 copies of comments for filing in CC  
Docket 92-105. The extra copies are for distribution to the  
Commissioners.



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Attorney

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Federal Communications Commission  
Office of the Secretary

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FCC 92-203  
38393

In the Matter of

The use of N11 Codes and other  
Abbreviated Dialing Arrangements

CC Docket 92-105

COMMENTS OF ALTERNATIVE WEEKLY NEWSPAPERS,  
NEW TIMES, INC., SASQUATCH PUBLISHING,  
CITY PAGES, AND TUCSON WEEKLY

The alternative newspapers, New Times, Inc., Sasquatch Publishing, City Pages, and Tucson Weekly file the following comments in response to the Commission's NOPR released May 6, 1992:

#### INTRODUCTION AND BACKGROUND

1. The alternative newspapers filing these comments are all published weekly and emphasize coverage of arts and entertainment, together with local political, governmental, investigative and feature stories. Each paper also has at least one significant information service for its readers based on telephone local pay per call services which are the subject matter of the Commission's NOPR. The weekly newspapers are Westword in Denver, the New Times in Phoenix, the Dallas Observer, and the Miami New Times, all published by New Times, Inc. in Phoenix; the Seattle Weekly and Eastsideweek, owned by Sasquatch Publishing of Seattle; City Pages in Minneapolis, and the Tucson Weekly.

#### ALTERNATIVE NEWSPAPERS SERVE LOCAL INFORMATION MARKETS

2. Information markets served by these alternative newspapers are local. They include classified dating personal

advertising as well as reader editorial response. Typically, more than 90% of customer calls to these services are from the local distribution area where the papers are available. In each case, local 976 or similar regulated telephone company services are used to provide access and to bill customers for their calls. Uncollectible rates for the services offered by the alternative newspapers approximate the uncollectible rates of the telcos who do the billing and collection--evidence that these are neither scam nor smut services. The alternative newspapers take thorough precautions to guide their customers through the use of the service so that customers are satisfied. These services offer real value for which customers are willing to and do pay. A significant repeat business is observed, again customer testimony that the services are valued. One RBOC, U.S. West, has stated that these are "the ideal" local information services. These existing, profitable services may even meet or exceed the expectations set out for the information services market for economic development, innovative customer service, and increased use of the public network in the rhetoric so often employed by the current FCC Chairman!

3. These alternative newspapers want to continue and to expand their information service offerings. Based on their timely and in depth coverage of the local restaurant, club, music, theater, movie, and sports scene, they plan to offer interactive telephone information services to help their customers find the arts and entertainment services they want.

Telephone services offer these alternative newspapers a convenient, low-cost means of expanding their information services in the specialized markets they serve.

#### ALTERNATIVE NEWSPAPERS NEED LOCAL TELCO ACCESS AND BILLING SERVICES

4. BUT, the local telephone service the alternative newspapers require to provide these innovative information services is a threatened species. In one case, U.S. West has officially announced that its 976 access and billing and collection services are to be withdrawn in state tariff filings which could be made as early as June, 1992. The alternative newspapers have made it clear that withdrawal of 976 local service tariffs will be a hotly contested matter in the state commissions, unless a workable, inexpensive alternative local billing and collection service is provided. Withdrawal of 976 service would squeeze out potential competitors to the information services of RBOCS, unless a functional alternative is provided. The alternatives to 976 service offered by U.S. West include 900 service and a yet-unpriced 960 Network Access Service which will include local telephone access and a billing contract with the Carrier Marketing unit. 900 service is too expensive for the local information services offered by the alternative newspapers. Their customers don't need a national service, and are unwilling to pay the rates demanded by the providers of national access and billing when the service customers want is local and low cost. The new 960 service has not been formally announced. Its pricing and terms and conditions are not known to the alternative

newspapers. During the pendency of the comment cycle on the Commission's NOPR, U.S. West has refused to offer the alternative newspapers a three-digit dialing option.

#### ALTERNATIVE NEWSPAPERS REQUEST THREE DIGIT DIALING

4. Following the positive BellSouth response to the Cox Newspapers' request for three digit dialing, the alternative newspapers have requested that they also be provided three digit access in the markets they serve. This might be the start of an avalanche of requests which would exhaust the available three digit dialing combinations, but it might also be the whole iceberg rather than the tip. The Commission won't ever know unless it allows three digit dialing for information services to be tried.

#### TRY IT, YOU MIGHT LIKE IT

5. We advocate an experiment, since the available three digit combinations are not now being used for anything else. They could be used for a transition experiment on the way to a four digit dialing information service which might require some time to develop. Whatever path the Commission chooses to take, the alternative newspapers urge that the telcos' information services should use the same dialing patterns as the information services provided by others.

#### TRY IT, WE MIGHT LIKE IT

6. Three or four digit dialing would be a big boost for the information services now provided by the alternative newspapers. Customers would find it easier to remember, easier to dial, and

faster and quicker than seven or ten digit alternatives. The alternative newspapers could promote their existing and planned new services with the experiment in easier dialing as a leading reason for customers to use the services: "Dial 211 for arts and entertainment information--now its easy, quick, and fun!"

Since three digit dialing is already in place, used by the telcos, charged for and paid by customers, it should have few, if any technical issues to be solved for use by the alternative newspapers. And since customers are already familiar with three digit dialing for telephone number information, they should find it easy to use. If the currently unused three digit numbers are needed to play a role in the NANP later, then six months notice to the alternative newspapers and a workable four digit dialing alternative would be an acceptable transition strategy.

#### CURRENT, INNOVATIVE USE OUTWEIGHS THE POTENTIAL HARM

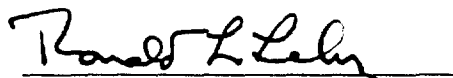
7. It seems clear that a current and innovative use for these now-unused numbers should outweigh whatever their non-use value might be to meet currently undefined needs in the future. This is particularly true if the Commission declares their current use to be conditioned on the definition of their future use, the actual showing of need for their use in the future, and on the development of the four digit alternative, beginning now. The Commission should find that first-come, first-served current use of the available and unused three-digit dialing sequences is in the public interest. This finding should be accompanied by orders to Bellcore to work out the four-digit alternatives in

parallel with current, experimental use of the three digit numbers. A time deadline for Bellcore's resolution would force action. We suggest one year.

#### CONCLUSION

Based on the alternative newspaper's request for three-digit dialing to be provided in the local information service markets they currently serve, we request that the Commission order experimental use of three digit information service dialing to see how it works out. The Commission should also require Bellcore to work out four digit dialing as an alternative within one year.

Respectfully submitted,



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Date: June 5, 1992  
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